

EXHIBIT 111

TSG Reporting - Worldwide (877) 702-9580

1 the demographics & experiences of the students we
2 may see in our pool"?

3 MR. DULBERG: Objection.

4 THE WITNESS: I don't know who wrote this.
5 I think what may have been intended is to
6 communicate the hope that this information could be
7 helpful to admissions officers as they evaluated
8 applicants.

9 Q BY MR. CONNOLLY: Turn to 13775. Can you
10 tell me what is depicted on this slide?

11 MR. DULBERG: Objection.

12 THE WITNESS: I believe it is a breakdown of
13 the approximate number of students scoring above 650
14 on any given section, on a given section of the SATs
15 by race.

16 Q BY MR. CONNOLLY: Why did you provide this
17 information at this presentation?

18 A I thought it could be helpful in providing
19 context as admissions officers evaluated applicants.

20 Q Can you give me an example of how it would
21 be helpful?

22 A It would help provide a backdrop for
23 understanding what part a student's scores may look
24 like relative to their peers'.

25 Q Peers of the same racial group?

1 A Perhaps.

2 Q Would be a student's scores relative to his
3 peers of the same race be taken into account in
4 admissions decisions?

5 MR. DULBERG: Objection.

6 THE WITNESS: I don't know how admissions
7 officers may or may not have taken that into
8 account.

9 Q BY MR. CONNOLLY: Would you ever do that?

10 MR. DULBERG: Objection.

11 THE WITNESS: It might be one of several
12 contextual factors that I would consider.

13 Q BY MR. CONNOLLY: So on this slide it says
14 that approximately 4,203 African-Americans scored
15 above a 650 on the math portion of the SAT. Do I
16 have that right?

17 A Yes.

18 Q Okay. Is the context that this slide is
19 meant to convey is that if the admissions officer
20 was reviewing an African-American student with above
21 a 650 on the math portion of the SAT the admissions
22 officer should know that the student is only one of
23 4,203 African-Americans with such a score?

24 MR. DULBERG: Objection.

25 THE WITNESS: This slide was meant to

1 portray data, approximate data of how admissions
2 officers then considered that or didn't consider
3 that in their evaluation.

4 Q BY MR. CONNOLLY: Presumably you included
5 this slide because you wanted it to be helpful for
6 admissions officers; is that correct?

7 MR. DULBERG: Objection.

8 THE WITNESS: I thought this information
9 could be helpful.

10 Q BY MR. CONNOLLY: Okay. Is one of the ways
11 in which you thought it could be helpful is that an
12 admissions officer should know how many other
13 students of a similar race had similar SAT scores?

14 MR. DULBERG: Objection.

15 THE WITNESS: Yes.

16 Q BY MR. CONNOLLY: In your role in the UMRP
17 did you seek to recruit minority students to
18 Harvard?

19 A In which role?

20 Q As co-director in the UMRP.

21 A We sought to support students through their
22 application and selection process.

23 Q Would the UMRP ever send emails to minority
24 students encouraging them to apply to Harvard?

25 A Yes.

1 A Yes.

2 Q It says, "For example, if we're thinking of
3 the number of black students in the entire country
4 scoring above 700, we're looking at a little over
5 2,000. And this is students in the entire country,
6 not necessarily students who are even applying
7 here." Did I read that right?

8 A Yes.

9 Q Why would that information be important for
10 an admissions officer to know?

11 MR. DULBERG: Objection.

12 THE WITNESS: Can you clarify what you mean
13 by important?

14 Q BY MR. CONNOLLY: Why would you have
15 conveyed this information?

16 MR. DULBERG: Objection.

17 THE WITNESS: I don't recall precisely what
18 was said relative to the notes but we wanted to
19 provide the general data and information because we
20 thought it could help provide context and an
21 additional background for admissions officers as
22 they were evaluating applicants in addition to the
23 other contextual factors they may will have
24 considered.

25 Q BY MR. CONNOLLY: And what is the type of

1 likelihood of whether or not, of how I would
2 evaluate an applicant.

3 Q BY MR. CONNOLLY: I don't understand then
4 why you provided this information to admissions
5 officers if it had no effect on your own decision-
6 making.

7 A Is there a question?

8 Q Why would you have provided this information
9 if it had no effect on your own decision-making?

10 MR. DULBERG: Objection. Misstates the
11 testimony.

12 THE WITNESS: I thought this information
13 could be helpful in providing context for myself as
14 a reviewer, this information provided an additional
15 level of context in evaluating an applicant along
16 with the aforementioned being such as the student's
17 high school, geographical background, socioeconomic
18 background, among other things.

19 Q BY MR. CONNOLLY: So it is your testimony
20 that the number of students of a certain race with
21 certain SAT score across the nation would have no
22 affect on your you decision making for individual
23 applicants.

24 MR. DULBERG: Objection.

25 THE WITNESS: No.

REPORTER'S CERTIFICATE

I, SUSAN A. SULLIVAN, CALIFORNIA CSR No. 3522, RPR, CRR, do hereby certify:

That prior to being examined LUCERITO ORTIZ, the witness named in the foregoing deposition, was, before the commencement of the deposition, duly administered an oath in accordance with C.C.P. Section 2094;

That the said deposition was taken before me at the time and place therein set forth, and was taken down by me in shorthand and thereafter transcribed into typewriting under my direction and supervision; that the said deposition is a true and correct record of the testimony given by the witness;

I further certify that I am neither counsel for, nor in any way related to any party to said action, nor in any way interested in the outcome thereof.

IN WITNESS WHEREOF, I have subscribed my name on this 26th day of June, 2017.

SUSAN A. SULLIVAN CSR